

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	
HOUSTON REAL ESTATE PROPERTIES,	§	
LLC	§	
<i>Debtor,</i>	§	
	§	
JOHN QUINLAN, OMAR KHAWAJA,	§	
AND OSAMA ABDULLATIF	§	CASE NO. 22-32998
<i>Plaintiffs,</i>	§	(Chapter 7)
	§	
v.	§	Case No. 23-03141
	§	Adversary Proceeding
HOUSTON REAL ESTATE PROPERTIES,	§	
LLC, ET AL	§	
<i>Defendants.</i>	§	

PLAINTIFFS' SECOND AMENDED WITNESS AND EXHIBIT LIST

John Quinlan, Omar Khawaja, and Osama Abdullatif ("Plaintiffs"), designate the following witnesses and exhibits that may be used or called in connection with the above-referenced matter and adopts all other exhibits and exhibit lists submitted by all other parties as its own by reference, reserving its right to object to any of those exhibits.

Witnesses:

1.	Any witness designated by another party	Judge: Jeffrey P. Norman
2.	Any witness called by any other party	Hearing Date: December 20, 2024
3.	Any witness necessary for rebuttal	Hearing Time: 9:00 a.m.
		Parties' Name: Plaintiffs
		Attorney: Steven A. Leyh/Michael Ballases
		Attorney Phone: (713) 977-8686
		Nature of Proceeding: Ali Choudhri's Motion for The Recusal/Disqualification of Judge Jeffrey P. Norman

Exhibit List:

No.	ECF. Doc. No.	Description	Offer	Obj.	Admitted	Not Admitted
1.	252-1 & 252-2	Full deposition transcript of portion showing Choudhri misrepresented its contents to this Court.				
2.	369-1	Order sanctioning Ali Choudhri, in the amount of \$12,195.00 and noting that he asserted frivolous claims.				
3.	369-2	Order sanctioning Ali Choudhri, in the amount of \$11,657.50.				
4.	369-3	Order instructing Ali Choudhri to stop filing pleadings seeking affirmative relief.				
5.	369-4	Order sanctioning Jetall in the amount of \$122,752.60.				
6.	369-5	Pleading where Ali Choudhri's own attorney (former) accused him of fraud .				
7.	369-6	Order sanctioning Jetall in the amount of \$90,000.00 and noting therein that <i>"Jetall has been sanctioned multiple times in past litigation for engaging in improper and repugnant actions, in courts of law; Jetall brought this, lawsuit for an improper purpose, which was to harass and increase the cost litigation and to cause opposing counsel to personally incur unnecessary expense so as to dissuade its opposing counsel from representing parties adverse to Jetall"</i> .				
8.	369-7	Order sanctioning an entity owned by Ali Choudhri in the amount of \$63,725.00.				
9.	369-8 (AA-9)	Final Arbitration Order against Ali Choudhri and entities he controls noting that Ali Choudhri committed fraud (p.26) and lied under oath (p.28).				
10.	369-9	Final Judgment against Ali Choudhri and entities he controls noting that they committed fraud (again).				
11.	369-10	Memorandum opinion noting that Ali Choudhri and entities that he controls engage in schemes to improperly halt foreclosures and nuisance litigation (p. 16), have filed numerous unfounded bankruptcies as a part of this scheme (p.17), and has a reputation in the community as lacking the ability to be truthful (p.18).				
12.	369-11 (AA-12)	Order referring Ali Choudhri to the United States Attorney for criminal prosecution for filing a fraudulent proof of claim (p. 1) and noting that Ali Choudhri is a "forger" and a "liar" (p.3).				
13.	369-12 (AA-13)	Order denying a motion for reconsideration filed by Ali Choudhri noting therein that his motion contained a "materially false statement" (p.3).				
14.	369-13	Memorandum Opinion noting that Ali Choudhri lied about his medical condition in order to gain an extension of a deadline, which was denied as a result of his lying (pgs.2-3).				
15.	369-14 (AA-15)	Pleading from Jetall and Ali Choudhri wherein they assert their Fifth (5th) Amendment (right against self-incrimination) in a matter with the Department of Justice.				
16.	369-15	Email noting that Ali Choudhri harasses Court staff				

Movants incorporate in the Exhibit List the pleadings and other papers filed in this case, related proceedings and other court filings, as permitted by the rules and applicable authority, including Federal Rules of Evidence Rule 201 and request the Court take judicial notice of those documents if requested. Movants further reserve the right to introduce or rely upon any exhibit designated by any party and to introduce any exhibit, document, or information to rebut or impeach any statement, testimony or exhibit.

DATED: December 18, 2024

Respectfully submitted,

HOOVER SLOVACEK, LLP

By: /s/ Steven A. Leyh

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**ATTORNEYS FOR PLAINTIFFS,
JOHN QUINLAN, OMAR KHAWAJA, and
OSAMA ABULLATIF**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served electronically upon each of the parties identified on the Court's ECF Service List maintained in this case, on December 18, 2024, and as additionally noted below.

23-03141 Notice will be electronically mailed to:

James Pope
Jennifer MacGeorge
**Jetall Companies, Inc., Arabella PH
3201 LLC, 9201 Memorial Dr. LLC,
2727 Kirby 26L LLC, Dalio Holdings
I, LLC, Dalio Holdings II, LLC,
Houston Real Estate Properties, LLC
[Debtor], Shahnaz Choudhri, Ali
Choudhri, Shepherd-Huldy
Development I, LLC, Shepherd-
Huldy Development II, LLC, Galleria
Loop Note Holder LLC, Otisco rdX,
LLC, MCITBE, LLC, Jetall/Croix
Properties LP, and its general partner
Jetall/Croix GP, LLC**
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By: /s/ Steven A. Leyh
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